

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

Case No. 3:17-cv-05806-RJB

**DECLARATION OF ADRIENNE
SCHEFFEY IN SUPPORT OF
DEFENDANT THE GEO GROUP, INC.'S
OPPOSITION TO PLAINTIFF STATE OF
WASHINGTON'S MOTION TO COMPEL
PARTIALLY UNREDACTED LETTER
AND RELATED FINANCIAL
CALCULATIONS**

I, Adrienne Scheffey, make the following statement under oath subject to the penalty of perjury pursuant to the laws of the United States and the State of Washington:

1. I am one of the attorneys for The GEO Group, Inc. in the above-captioned matter. I am over the age of eighteen (18), and I am competent to testify in this matter.

2. Prior to filing this declaration, I contacted Carolyn Lee at Veritext to inquire as to the origin of the "Under Protective Order" designations on the Brian Evans deposition.

3. Initially, Veritext indicated the designations were made by an attorney who was not involved in this case, but thereafter stated that was in error.

4. Veritext indicated that the designation was based upon the court reporter's assessment of the colloquy on the record regarding individuals who were not counsel of record who attended the deposition. Ms. Lee indicated the designations were not made at the request of counsel.

1 5. I requested that a revised copy be distributed to all counsel of record. Ms. Lee
2 indicated she would not do so without “an agreement from all parties.”

3 6. Attached are true and correct copies of the following exhibits:

4 **EXHIBIT A:** Attached as Exhibit A are true and correct copies of the deposition of Brian
5 Evans, taken by Plaintiffs on June 11, 2020.

6 Dated this 2nd day of September, 2020 at Denver, Colorado.

7 Akerman LLP

8 s/ Adrienne Scheffey

9 Adrienne Scheffey (Admitted *pro hac vice*)
Attorney for Defendant The GEO Group, Inc.

PROOF OF SERVICE

I hereby certify on the 2nd day of September 2020, pursuant to Federal Rule of Civil Procedure 5(b), I electronically filed and served the foregoing **DECLARATION OF ADRIENNE SCHEFFEY IN SUPPORT OF DEFENDANT THE GEO GROUP, INC.'S OPPOSITION TO PLAINTIFF STATE OF WASHINGTON'S MOTION TO COMPEL PARTIALLY UNREDACTED LETTER AND RELATED FINANCIAL CALCULATIONS** via the Court's CM/ECF system on the following:

Marsha J. Chien
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s/ Toni Domres
Toni Domres